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Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re:	)	
	)	Case No. 18-30949-dwh11
SAGE GROUP, LLC,	)	
	)	DEBTOR'S OBJECTION TO CREDITORS
Debtor.	)	WESTERN LAND HOLDING I LLC AND
	)	PACIFIC NORTHWEST LAND
	)	DEVELOPMENT LLC'S MOTION FOR
	)	RELIEF FROM STAY

Creditors' argument that they should be granted relief because there is no equity in the properties and that the properties are not necessary for an effective reorganization. Debtor will present evidence that the combined value of the properties is approximately \$2,400,000. Debtor, along with the owner of 11572 SW Toulouse Street, Wilson, Oregon (referred to as Phase I) will propose a sale of the properties free of liens under 11 U.S.C. § 363(f). The sale will be noticed within the next 30 days. Debtor believes that the sale will bring a higher price than the proposed sheriff's sale in Clackamas County.

The unsecured creditors and under secured creditors may benefit from the § 363 sale. The sale will not harm the moving creditors as they will be able to credit bid their judgments to the extent they are not covered by the sale proceeds. The sale will also benefit the co-debtors on the judgments by reducing the likely high deficiency judgment if the sale is conducted as a sheriff's sale in Clackamas County.

The sale free of liens under § 363 would be without the possibility of redemption by the Debtor or junior lien holders which should also increase the total amount the properties will sell for.

Debtor requests that the Court deny the Motion for Relief and allow it to propose a sale under § 363 free and clear of liens.

Dated this 12<sup>th</sup> day of April, 2018.

Troutman Law Firm, P.C.

/s/Ted A. Troutman

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Attorney for Debtor